

1 WILLIAMS & CONNOLLY LLP  
2 Joseph G. Petrosinelli (*pro hac vice*)  
3 725 12th Street, NW  
4 Washington, DC 20005  
5 Telephone: (202) 434-5000  
6 Email: jpetrosinelli@wc.com

7 *Lead Counsel for Defendant Pfizer Inc.*

8 COVINGTON & BURLING LLP  
9 Michael X. Imbroscio (*pro hac vice*)  
10 One City Center  
11 850 Tenth Street, NW  
12 Washington, DC 20001-4956  
13 Telephone: (202) 662-6000  
14 Email: mimbroscio@cov.com

15 *Lead Counsel for Defendant Eli Lilly and Company*

16 CORY WATSON, P.C.  
17 Ernest Cory (*pro hac vice*)  
18 2131 Magnolia Avenue  
19 Birmingham, AL 35205  
20 Telephone: (205) 328-2200  
21 Email: ecory@corywatson.com

22 *Lead Counsel for Plaintiffs*

23 **UNITED STATES DISTRICT COURT**  
24 **NORTHERN DISTRICT OF CALIFORNIA**

25 IN RE: VIAGRA (SILDENAFIL CITRATE)  
26 AND CIALIS (TADALFIL) PRODUCTS  
27 LIABILITY LITIGATION

Case No. 3:16-md-02691-RS

MDL No. 2691

28 This Document Relates to:

ALL ACTIONS

**JOINT EXHIBIT LIST TO PARTIES'  
MOTIONS TO EXCLUDE CERTAIN  
EXPERTS' OPINIONS**

29 The parties jointly submit the attached list of exhibits in support of the parties' briefing of  
30 their Motions to Exclude Certain Experts' Opinions. True and correct copies of the exhibits listed  
31 on the attached are electronically filed with this Court using the CM/ECF system.

Dated: January 11, 2019

Respectfully submitted,

BY: /s/ Joseph G. Petrosinelli

WILLIAMS & CONNOLLY LLP  
Joseph G. Petrosinelli (*pro hac vice*)  
725 12th Street, NW  
Washington, DC 20005  
Telephone: (202) 434-5000  
Facsimile: (202) 434-5029 (fax)  
Email: jpetrosinelli@wc.com

*Attorneys for Defendant Pfizer Inc.*

COVINGTON & BURLING LLP  
Michael X. Imbroscio (*pro hac vice*)  
One City Center  
850 Tenth Street, NW  
Washington, DC 20001-4956  
Telephone: 202-662-6000  
Email: mimbrosio@cov.com

*Attorneys for Defendant Eli Lilly and Company*

CORY WATSON, P.C.  
Ernest Cory (*pro hac vice*)  
2131 Magnolia Avenue  
Birmingham, AL 35205  
Telephone: (205) 328-2200  
Email: ecory@corywatson.com

*Lead Counsel for Plaintiffs*

ATTACHMENT

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

## Joint Exhibit List for General Causation Daubert Motions

Daubert Joint Ex. #	Description	Date	Orig. Ex. # (If Joint Exhibit has been used as Deposition Exhibit)
1	Plaintiffs' Expert Disclosures on General Causation	4/20/2018	
2	Report of Sonal Singh, M.D., MPH, including reliance materials list	4/19/2018	Singh Ex. 1; Ahmed Ex. 21
3	CV of Dr. Sonal Singh	4/19/2018	Singh Ex. 2; Wei Ex. 9
4	Dr. Singh Updated Reliance Materials List	8/6/2018	Singh Ex. 10
5	Report of Gary Piazza, Ph.D., including reliance materials list	4/20/2018	Piazza Ex. 1
6	Rebuttal Expert Report of Dr. Gary Piazza	7/13/2018	Piazza Ex. 2
7	CV of Dr. Gary Piazza	4/20/2018	Wei Ex. 7
8	Dr. Piazza Additional Materials Considered	9/4/2018	Piazza Ex. 3
9	Report of Rizwan Haq, M.D., Ph.D., including reliance materials list	4/20/2018	Haq Ex. 2
10	CV of Dr. Rizwan Haq	4/20/2018	Haq Ex. 3; Wei Ex. 6
11	Haq Additional Materials Considered	8/17/2018	Haq Ex. 4
12	Haq Updated Additional Materials Considered	8/20/2018	Haq Ex. 5
13	Report of Rehana Ahmed-Saucedo, M.D., Ph.D. Concerning Sildenafil Use (Viagra), including reliance materials list [Redacted Pursuant to Motion to Seal]	5/21/2018	Ahmed Ex. 3
14	Report of Rehana Ahmed-Saucedo, M.D., Ph.D. Concerning Tadalafil Use (Cialis), including reliance materials list	4/20/2018	Ahmed Ex. 2
15	CV of Dr. Rehana Ahmed-Saucedo	4/20/2018	Ahmed Ex. 4
16	Ahmed Additional Materials Considered	9/10/2018	Ahmed Ex. 5
17	Report of Anand Ganesan, M.D., Ph.D., including reliance materials list	4/19/2018	Ganesan Ex. 5
18	CV of Dr. Anand Ganesan	4/19/2018	Ganesan Ex. 4
19	Ganesan Additional Materials Considered	8/14/2018	Ganesan Ex. 1
20	Report of Feng Liu-Smith, Ph.D., including reliance materials list	4/19/2018	Liu-Smith Ex. 2
21	CV of Dr. Feng Liu-Smith	4/19/2018	Liu-Smith Ex. 3
22	Liu-Smith Additional Materials Considered	9/7/2018	Liu-Smith Ex. 4
23	Pfizer's Expert Disclosures on General Causation	6/8/2018	
24	Report of Joseph Califano, III, M.D., including reliance materials list	6/8/2018	Califano Ex. 1
25	CV of Dr. Joseph Califano, III	6/8/2018	Califano Ex. 3
26	Califano Additional Materials Received	9/18/2018	Califano Ex. 2
27	Report of Richard Marais, Ph.D., including reliance materials list	6/8/2018	Piazza Ex. 20; Ahmed Ex. 11; Marais Ex. 1
28	CV of Dr. Richard Marais	6/8/2018	Marais Ex. 3
29	Marais Additional Materials Received	10/28/2018	Marais Ex. 2
30	Report of Lynn Schuchter, M.D., including reliance materials list	6/5/2018	Schuchter Ex. 1; Wei Ex. 5
31	CV of Dr. Lynn Schuchter	6/5/2018	Schuchter Ex. 2
32	Schuchter Additional Materials Received	9/25/2018	Schuchter Ex. 5
33	Report of Maria Wei, M.D., Ph.D., including reliance materials list	6/8/2018	Wei Ex. 1
34	CV of Dr. Maria Wei	6/8/2018	Wei Ex. 2
35	Wei Additional Materials Received	11/13/2018	Wei Ex. 3
36	Report of John Witte, Ph.D., including reliance materials list	6/8/2018	Witte Ex. 1

## Joint Exhibit List for General Causation Daubert Motions

Daubert Joint Ex. #	Description	Date	Orig. Ex. # (If Joint Exhibit has been used as Deposition Exhibit)
37	CV of Dr. John Witte	6/8/2018	
38	Witte Additional Materials Received	11/12/2018	
39	In Re: Viagra (Sildenafil Citrate) and Cialis (Tadalafil) Products Liability Litigation, MDL No. 2691 Materials Received by Pfizer Inc.'s Experts	6/8/2018	Schuchter Ex. 3; Wei Ex. 4
40	Lilly's Expert Disclosure on General Causation	6/8/2018	
41	Report of Karla Ballman, Ph.D., including reliance materials list	6/8/2018	Liu-Smith Ex. 22; Witte Ex. 6; Ballman Ex. 2 & Ex. 31
42	CV of Dr. Karla Ballman	6/8/2018	Ballman Ex. 4
43	Ballman Supplemental Materials Considered	10/25/2018	Ballman Ex. 32
44	Report of Boris Bastian, M.D., Ph.D., including reliance materials list	6/8/2018	Bastian Ex. 1 & Ex. 3
45	CV of Dr. Boris Bastian	6/8/2018	Bastian Ex. 2
46	Bastian Supplemental Materials Considered	10/3/2018	Bastian Ex. 4
47	Report of Marcus Bosenberg, M.D., Ph.D., including reliance materials list	6/8/2018	Piazza Ex. 21; Bosenberg Ex. 2 & Ex. 3
48	CV of Dr. Marcus Bosenberg	6/8/2018	Bosenberg Ex. 5
49	Bosenberg Supplemental Materials Considered		Bosenberg Ex. 4
50	Report of Samuel Cohen, M.D., Ph.D., including reliance materials list	6/8/2018	Cohen Ex. 4 & Ex. 8
51	CV of Dr. Samuel Cohen	6/8/2018	Cohen Ex. 2
52	Cohen Supplemental Materials Considered	9/14/2018	Cohen Ex. 9
53	Cohen Updated Supplemental Materials Considered	11/2/2018	Cohen Ex. 10
54	Deposition Transcript of Dr. Sonal Singh	8/9/2018	Liu-Smith Ex. 6
55	Singh Deposition Errata	Pending	
56	Deposition Transcript of Dr. Anand Ganesan	8/17/2018	
57	Ganesan Deposition Errata	9/29/2018	
58	Deposition Transcript of Dr. Rizwan Haq	8/22/2018	
59	Haq Deposition Errata	9/26/2018	
60	Deposition Transcript of Dr. Gary Piazza September 6, 2018	9/6/2018	
61	Deposition Transcript of Dr. Gary Piazza September 7, 2018	9/7/2018	
62	Piazza Deposition Errata	10/10/2018	
63	Deposition Transcript of Dr. Feng Liu-Smith	9/11/2018	
64	Liu-Smith Deposition Errata	11/14/2018	
65	Deposition Transcript of Dr. Rehana Ahmed-Saucedo	9/13/2018	
66	Ahmed Deposition Errata	10/19/2018	
67	Deposition Transcript of Dr. Joseph Califano	9/21/2018	
68	Califano Deposition Errata	10/31/2018	
69	Deposition Transcript of Dr. Lynn Schuchter	9/28/2018	
70	Schuchter Deposition Errata	11/14/2018	
71	Deposition Transcript of Dr. Richard Marais	10/31/2018	
72	Marais Deposition Errata	12/21/2018	

## Joint Exhibit List for General Causation Daubert Motions

Daubert Joint Ex. #	Description	Date	Orig. Ex. # (If Joint Exhibit has been used as Deposition Exhibit)
73	Deposition Transcript of Dr. John Witte	11/15/2018	
74	Witte Deposition Errata	12/18/2018	
75	Deposition Transcript of Dr. Maria Wei	11/16/2018	
76	Wei Deposition Errata	12/18/2018	
77	Deposition Transcript of Dr. Boris Bastian	10/3/2018	
78	Bastian Deposition Errata	12/6/2018	
79	Deposition Transcript of Dr. Marcus Bosenberg	11/2/2018	
80	Bosenberg Deposition Errata	1/9/2019	
81	Deposition Transcript of Dr. Karla Ballman	11/15/2018	
82	Ballman Deposition Errata	1/10/2019	
83	Deposition Transcript of Dr. Samuel Cohen	11/7/2018	
84	Cohen Deposition Errata	1/4/2019	
85	Arozarena et al., Oncogenic BRAF induces melanoma cell invasion by downregulating the cGMP-specific phosphodiesterase PDE5A, Cancer Cell. 2011 Jan 18;19(1):45-57. [with supplement]	1/6/2011	Haq Ex. 8; Ganesan Ex. 3; Piazza Ex. 4; Ahmed Ex. 8; Marais Ex. 4; Bastian Ex. 5 & Ex. 6; Bosenberg Ex. 6 & 7
86	Deng et al., Association between phosphodiesterase type 5 inhibitors use and risk of melanoma: a meta-analysis. Neoplasma. 2018;65(2):216-221.	3/13/2018	Liu-Smith Ex. 19; Ballman Ex. 21
87	Dhayade et al., Sildenafil Potentiates a cGMP-Dependent Pathway to Promote Melanoma Growth, Cell Rep. 2016 Mar 22;14(11):2599-610. [with supplement]	3/22/2016	Singh Ex. 4; Haq Ex. 9; Ganesan Ex. 6; Piazza Ex. 5; Ahmed Ex. 9; Marais Ex. 5; Bastian Ex. 7; Bosenberg Ex. 8
88	Feng et al., Are phosphodiesterase type 5 inhibitors associated with increased risk of melanoma? A systematic review and meta-analysis, Medicine (Baltimore). 2018 Jan;97(3):e9601.	1/19/2018	Liu-Smith Ex. 18; Califano Ex. 18; Ballman Ex. 26
89	Han et al., Use of phosphodiesterase type 5 inhibitors and risk of melanoma: a metaanalysis of observational studies, Onco Targets Ther. 2018 Feb 5;11:711-20.	2/16/2018	Liu-Smith Ex. 17
90	Li et al., Sildenafil use and increased risk of incident melanoma in US men: a prospective cohort study, JAMA Intern Med. 2014 Jun;174(6):964-70.	4/7/2014	Singh Ex. 5; Liu-Smith Ex. 8; Ahmed Ex. 15; Califano Ex. 9; Marais Ex. 6
91	Lian et al., Phosphodiesterase Type 5 Inhibitors and the Risk of Melanoma Skin Cancer, Eur Urol. 2016 Nov;70(5):808-15.	5/10/2016	Singh Ex. 9; Ganesan Ex. 8; Liu-Smith Ex. 11; Ahmed Ex. 18; Califano Ex. 11; Witte Ex. 3; Ballman Ex. 17
92	Loeb et al., Meta-Analysis of the Association Between Phosphodiesterase Inhibitors (PDE5Is) and Risk of Melanoma, J Natl Cancer Inst. 2017 May 19;109(8) [with Corrigendum Aug. 3, 2017] [with supplement]	5/19/2017	Liu-Smith Ex. 15; Califano Ex. 16 and Ex. 17; Schuchter Ex. 9 and Ex. 10

## Joint Exhibit List for General Causation Daubert Motions

Daubert Joint Ex. #	Description	Date	Orig. Ex. # (If Joint Exhibit has been used as Deposition Exhibit)
93	Loeb et al., Use of Phosphodiesterase Type 5 Inhibitors for Erectile Dysfunction and Risk of Malignant Melanoma, JAMA. 2015 Jun 23-30;313(24):2449-55. [with supplement]	6/23/2015	Singh Ex. 7; Liu-Smith Ex. 9; Ahmed Ex. 14; Califano Ex. 10; Schuchter Ex. 7; Marais Ex. 7; Witte Ex. 2
94	Matthews et al., Phosphodiesterase Type 5 Inhibitors and Risk of Malignant Melanoma: Matched Cohort Study Using Primary Care Data from the UK Clinical Practice Research Datalink, PLoS Med. 2016 Jun 14;13(6):e1002037. [with supplement]	6/14/2016	Singh Ex. 8; Liu-Smith Ex. 10; Ahmed Ex. 17; Califano Ex. 13
95	Pottegård et al., Comment on the misleading conclusion reached by Wang et al. regarding use of phosphodiesterase 5 inhibitors and risk of melanoma. PubMed Commons. 2017 Aug 22 07:45 a.m.	8/22/2017	
96	Pottegård et al., Use of sildenafil or other phosphodiesterase inhibitors and risk of melanoma, Br J Cancer. 2016 Sep 27; 115(7):895-900. [including online supplement]	8/16/2016	Singh Ex. 6; Ganesan Ex. 9; Liu-Smith 12; Ahmed Ex. 16; Califano Ex. 14 and Ex. 15; Ballman Ex. 27
97	Shkolyar et al., Risk of melanoma with phosphodiesterase type 5 inhibitor use among patients with erectile dysfunction, pulmonary hypertension, and lower urinary tract symptoms. J Sex Med. 2018 Jul;15(7):982-989.	07/2018	Ganesan Ex. 10; Liu-Smith Ex. 13; Ahmed Ex. 19
98	Tang et al., Phosphodiesterase type 5 inhibitors and risk of melanoma: A meta-analysis, J Am Acad Dermatol. 2017 Sep;77(3):480-8. [with supplement]	7/18/2017	Liu-Smith Ex. 16; Ballman Ex. 20
99	Wang, et al., Relation of Phosphodiesterase Type 5 Inhibitors and Malignant Melanoma: A Meta-Analysis and Systematic Review. Oncotarget. 2017 Jul 11;8(28):46461-7.	4/29/2017	Liu-Smith Ex. 14;
100	Bischoff, E., Potency, selectivity, and consequences of nonselectivity of PDE inhibition, Int. J. of Impotence Res. 2004;16:S11-S14.	06/2004	Piazza Ex. 14
101	Boor et al., Melanoma in Men Treated with PDE5A Inhibitors: A Report from the RADAR Project, J Am Acad Dermatol 2016 May:Abstr. No. 3174.	5/1/2016	
102	Bradford Hill, The Environment and Disease: Association or Causation? Proc R Soc Med 1965 May;58(5):295-300.	5/1965	Ballman Ex. 22
103	Fane et al., BRN2, a POUerful driver of melanoma phenotype switching and metastasis, Pigment Cell Melanoma Res 2018;1-16.	5/21/2018	Ganesan Ex. 2
104	Feil, Viagra releases the brakes on melanoma growth, Mol Cell Oncol. 2017;4(5):e1188874.	5/31/2017	Witte Ex. 7
105	Hassel et al., Tadalafil has biologic activity in human melanoma. Results of a pilot trial with Tadalafil in patients with metastatic Melanoma (TaMe), Oncoimmunology. 2017 May 16;6(9):e1326440.	5/16/2017	Ganesan Ex. 12; Piazza Ex. 17; Bastian Ex. 10
106	Houslay, M., Hard Times for Oncogenic BRAF-Expressing Melanoma Cells, Cancer Cell 2011 Jan 18;19:3-5.	1/18/2011	Piazza Ex. 11
107	Houslay, M., Melanoma, Viagra, and PDE5 Inhibitors: Proliferation and Metastasis, Trends Cancer 2016 Apr;2(4):163-165.	04/2016	Liu-Smith Ex. 7
108	Lambert et al., How sildenafil (Viagra) may cause melanoma: A histopathologic study providing a potential physiological/etiopathological mechanism. J Eur Acad Dermatol Venereol. 2018 May;32(5):e202-e204.	5/2018	Piazza Ex. 8; Ahmed Ex. 7

## Joint Exhibit List for General Causation Daubert Motions

Daubert Joint Ex. #	Description	Date	Orig. Ex. # (If Joint Exhibit has been used as Deposition Exhibit)
109	Ma et al., Sildenafil Use and Risk of Malignant Melanoma: A Population Based Case-Control Study, J Am Acad Dermatol 2017 Jun;Abstr. No. 4238.	06/2017	Ballman Ex. 18
110	Meyer et al., Chronic inflammation promotes myeloid-derived suppressor cell activation blocking antitumor immunity in transgenic mouse melanoma model, Proc Natl Acad Sci U S A. 2011 Oct 11;108(41):17111-6.	10/11/2011	Piazza Ex. 16; Bastian Ex. 9
111	Morales, et al., Clinical safety of oral sildenafil citrate (VIAGRA) in the treatment of erectile dysfunction. Int J Impotence Res. 1998;10:69-74.	7/1998	Piazza Ex. 10
112	Murata et al., Expression and role of phosphodiesterase 5 in human malignant melanoma cell line. Anticancer Res. 2010 Feb;30(2):355-8.	2/1/2010	Haq Ex. 7; Ganesan Ex. 19; Piazza Ex. 9; Bastian Ex. 8
113	Nardone et al., Skin cancer associated with commonly prescribed drugs: tumor necrosis factor alpha inhibitors (TNF- $\alpha$ Is), angiotensin-receptor blockers (ARBs), phosphodiesterase type 5 inhibitors (PDE5Is) and statins -weighing the evidence, Expert Opin Drug Saf. 2018 Feb;17(2):139-147.	7/2/2018	Ahmed Ex. 20
114	Noonan et al., Melanoma induction by ultraviolet A but not ultraviolet B radiation requires melanin pigment, Nat Commun. 2012 Jun 6;3:884.	6/6/2012	Piazza Ex. 7
115	Packer et al., Identification of direct transcriptional targets of (V600E)BRAF/MEK signalling in melanoma, 2009 Dec;22(6):785-98.	12/2009	Ahmed Ex. 10
116	Serafini et al., Phosphodiesterase-5 inhibition augments endogenous antitumor immunity by reducing myeloid-derived suppressor cell function, JEM 2006 Nov 27;203:2691-2702.	11/27/2006	Haq Ex. 11; Piazza Ex. 15
117	Vesely et al., Four Cardiac Hormones Cause Cell Death of Melanoma Cells and Inhibit Their DNA Synthesis, Am J Med Sci. 2007 Nov;334(5):342-9.	11/2007	Ganesan Ex. 16
118	Zhang et al., PDE5 inhibitor promotes melanin synthesis through the PKG pathway in B16 melanoma cells, J Cell Biochem. 2012 Aug;113(8):2738-43.	8/2012	Piazza Ex. 6; Ahmed Ex. 12
119	Zhu, B. et al., Phosphodiesterase 10A is overexpressed in lung tumor cells and inhibitors selectively suppress growth by blocking $\beta$ -catenin and MAPK signaling, Oncotarget 2017;8(41):69264-19280.	9/19/2017	Piazza Ex. 24



**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing was electronically filed through the Court's CM/ECF system on January 11, 2019, which shall send notification of such filing to all CM/ECF participants.

/s/ Loren H. Brown  
Loren H. Brown